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U.S. DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

FILED

SEP 13 2006

ARLEN B. COYLE, CLERK
BY *[Signature]* Deputy

LEON MINNIEFIELD

PLAINTIFF

VS.

CIVIL ACTION NO. 4:06CV87-D-B

DOLLAR GENERAL CORPORATION
AND AMERICAN FUNDS

DEFENDANTS

COMPLAINT

COMES NOW Leon Minniefield, Plaintiff in the above-styled action and states the following:

1.

Plaintiff, Leon Minniefield, is an individual adult resident citizen of the City of Indianola, Sunflower County, State of Mississippi.

2.

Defendant, Dollar General Corporation (hereinafter "Dollar General") is a corporation organized and existing under the laws of the State of Mississippi, engaged in the distribution of consumer products within the Northern District of Mississippi.

3.

Defendant, American Funds, is the plan administrator for retirement and employment benefits for Dollar General and its employees.

4.

Jurisdiction of this Court is invoked pursuant to Section 502(e) of the Employment

Retirement Income Security Act of 1974, 29 U.S.C. Section 1132(e), 28 U.S.C. Section 1331, and the doctrine of pendent jurisdiction for wrongful discharge and related claims.

5.

Plaintiff was employed by Dollar General on April 21, 1998 as a yard jockey and was continuously in Defendant's employ until May 19, 2005 when he was wrongfully discharged for alleged misconduct. Said discharge was done in violation of the Defendant's own policies and procedures.

6.

As a result of the discharge by Dollar General, Plaintiff suffered the loss and termination of retirement and employment benefits affecting the security and well-being of himself and his family, as well as, other extensive damages.

7.

Plaintiff seeks reinstatement to his former job at Dollar General retroactive to the date of his discharge, without any break in his seniority.

8.

Plaintiff further seeks damages for lost wages and benefits, humiliation, mental and emotional distress, punitive damages, reinstatement into the Dollar General retirement and benefits plan and other equitable relief.

WHEREFORE, Plaintiff prays that his Complaint will be received and filed and that the Court will enter an order granting the following relief:

(a) Reinstatement to former position with Dollar General;

(b) Reinstatement of retirement and employment benefits retroactive to the date of discharge from employment;

- ©) Lost wages from the date of discharge;
- (d) Damages for wrongful discharge, humiliation, and emotional distress;
- (e) Punitive damages for Defendant's wrongful discharge;
- (f) All other relief to which Plaintiff may be entitled.

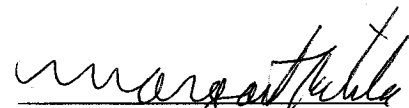
Respectfully Submitted,


LEON MINNIEFIELD
Plaintiff

STATE OF MISSISSIPPI
COUNTY OF WASHINGTON

PERSONALLY APPEARED BEFORE ME, the undersigned authority in the jurisdiction aforesaid, the within named LEON MINNIEFIELD, who upon oath, states that the facts and matters stated herein are true and correct to the best of his knowledge and belief.

SWORN TO AND SUBSCRIBED BEFORE ME this 17th day of May, 2006.


NOTARY PUBLIC

My Commission Expires:

My Commission Expires
January 9, 2007